

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO UNITED STATES POSTAL SERVICE WITNESS MAYES
(MPA/USPS-T23-1-2)
(November 20, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the following interrogatories to United States Postal Service witness Mayes (USPS-T-23).

Respectfully submitted,


James Pierce Myers

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MPA/USPS-T23-1. Please refer to your response to MPA/USPS-T34-15(b) where you state, "For non-destination SCF [Sectional Center Facility] Zone 1 & 2 pieces entered at the DBMC [destination bulk mail center] or destination transfer hub, it is assumed that 80 percent will be transported directly to the DSCF and 20 percent of the pieces will first travel through an intermediate facility (assumed to be the destination ADC [Area Distribution Center]) then be cross-docked to the DSCF."

(a) Please provide a citation to the original source of your assumption that 80 percent of zones 1 and 2 pieces that are entered at the DBMC or destination transfer hub will be transported directly to the DSCF and that 20 percent of these pieces will first travel through an intermediate facility.

(b) Please confirm that zones 1 and 2 pieces that are not entered at the Destination Area Distribution Center (DADC) or the DSCF can be entered at facilities other than the DBMC. If not confirmed, please explain your response fully. If confirmed, please answer the following questions:

(i) Why did you use zones 1 and 2 DBMC-entered periodicals as your benchmark against which to determine the DSCF and DADC nontransportation cost avoidances?

(ii) What percentage of zones 1 and 2 periodicals that are not entered at the DSCF or the DADC is entered at the DBMC? Please provide the source of your data.

(c) Please confirm that if a zones 1 and 2 periodical is entered at an origin associate office (OAO) that is in the DADC service territory, but not in the DSCF service territory, it will almost always be handled at the OAO and at an origin SCF (OSCF) before arriving at the DSCF. If not confirmed, please explain your response fully.

(d) Please confirm that if a zones 1 and 2 periodical is entered at an origin associate office (OAO) that is in the DADC service territory, but not in the DSCF service territory, it may be handled at the OAO, an OSCF, and the DADC before arriving at the DSCF. If not confirmed, please explain your response fully.

(e) Please confirm that if a zones 1 and 2 periodical is entered at an OSCF within the DADC service territory, it may be handled at both the OSCF and the DADC before arriving at the DSCF. If not confirmed, please explain your response fully.

(f) Please confirm that if a zones 1 and 2 periodical is entered at an OSCF within the DBMC service territory, but not the DADC service territory, it could be handled at the OSCF, the OADC, the DBMC, and the DADC before arriving at the DSCF. If not confirmed, please explain your response fully.

(g) Please confirm that if a zones 1 and 2 periodical is entered at an OADC within the DBMC service territory, it may be handled at the OADC, the DBMC, and the DADC before arriving at the DSCF. If not confirmed, please explain your response fully.

(h) Please confirm that, on average, mail entered in higher zones (e.g., zone 5) will be transported through more facilities than mail entered in lower zones (e.g., zones 1 and 2). If not confirmed, please explain your response fully.

(i) Please confirm that the advertising zone differentials in the Periodicals Outside-County subclass rate design do not reflect any nontransportation cost differences between lower zone mail (e.g., zones 1 and 2) and higher zone mail (e.g., zone 8). If not confirmed, please explain your response fully.

MPA/USPS-T23-2. Please refer to pages 25-26 of Docket No. R87-1, USPS-T-12. In particular, please refer to where witness Acheson states, "The reason mail


processing times were estimated for both one and two dock transfers is that zones 1 and 2 mail includes not only that mail I characterized as intra-sectional center facility (SCF) and intra-SDC [State Distribution Center] (see Table 2 on page 9) in the pallet study but also a portion of inter-SDC mail (mail requiring two intermediate handlings). For this analysis, I assumed that 80% of zones 1 and 2 mail not entered in the destination SCF area receives one cross-dock and that 20% of that mail receives two."

(a) Please confirm that area distribution centers (ADC) in today's operating environment serve a similar role in the postal network to that served by state distribution centers in the late eighties. If not confirmed, please explain your response fully.

(b) Is mail entered at the DBMC inter-ADC mail, intra-ADC mail, or could it be either? Please explain your response fully.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.


James Pierce Myers
Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

November 20, 2001
Alexandria, VA